

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE  
HAYDEE FRANQUI SANCHEZ  
Debtor  
-----  
Case No 16-4733 EAG  
Chapter 7

**REPLY TO OBJECTION TO CLAIM**

Come Now the Claimants, heirs of the ESTATE OF MANUEL MONSEGUR SANABRIA, through counsel, and respectfully state and pray as follows:

1. On October 15, 2021, the Debtor filed an Objection to Claims 5, 6, 7 & 8, wherein she argues that the same should be reclassified as unsecured, because they do not include evidence of perfection of the secured status.

2. The Claimants include herewith a Title Study, dated Oct 29, 2021, that shows that the Judgment & Execution issued in Case No ISCI 04-1931, granting Claims 5, 6, 7 & 8 their secured status, were properly presented at the Registry, and are currently pending recording in due course.

3. In view thereof, the Claimants request that Debtor's Objection to Claim be denied.

4. It is also requested that Claims 5, 6, 7 & 8 be deemed amended to include therewith the attached Title Study.

**WHEREFORE**, the Claimants respectfully request that, after the proper proceedings, this Court grant relief as requested.

**CERTIFICATE OF SERVICE**, It is hereby certified that true copy of this Motion was served electronically through the EM/ECF system to all parties participating, and by regular mail to all other interested parties as per master address list.

Santurce, Puerto Rico, this 2nd day of NOVEMBER, 2021.

S/José R Cintrón, Esq

USDC-PR 208411  
Calle Condado 605, Suite 602  
Santurce, Puerto Rico 00907  
Tel 787-725-4027  
Cel 787-605-3342  
Fax 787-725-1709  
[jrcintron@prtc.net](mailto:jrcintron@prtc.net)  
[lawoffice602@gmail.com](mailto:lawoffice602@gmail.com)

**COUNSEL FOR THE CLAIMANTS**